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Attorneys for Defendants WELLS FARGO
BANK, N.A. (successor by merger to
WACHOVIA BANK, N.A.) and
METROPOLITAN WEST SECURITIES LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

STATE COMPENSATION INSURANCE
FUND,

Plaintiff,

vs.

METROPOLITAN WEST SECURITIES
LLC; WACHOVIA BANK, N.A.; DOES
1 through 10, inclusive; and DOES 11
through 20, inclusive,

Defendants.

CASE NO. CV 09-02959 JSW (EDL)

**STIPULATION AND ~~[PROPOSED]~~ ORDER
CONTINUING DEADLINE TO SUBMIT
DISCOVERY STIPULATION**

[Declaration of James C. Rutten filed
concurrently herewith]

1 WHEREAS the parties filed cross-motions to compel on October 19, 2010;

2 WHEREAS the Court held a hearing on the motions on December 7, 2010;

3 WHEREAS the Court provided guidance to the parties at the hearing on many of the
4 disputed issues, and directed the parties to meet and confer further and to submit a stipulation by
5 December 21, 2010 setting forth agreements reached during that further meet-and-confer process;

6 WHEREAS the parties have had extensive telephonic and written meet-and-confer
7 discussions as directed by the Court;

8 WHEREAS those meet-and-confer discussions have been productive, in that the parties
9 have reached agreements, which they are in the process of documenting, on many of the disputed
10 issues;

11 WHEREAS the parties continue to meet and confer as to other issues raised by the
12 motions to compel, and believe that additional time is needed to complete those meet-and-confer
13 discussions with a view to resolving as many of the disputes as possible;

14 WHEREAS the parties believe that, particularly in light of the December holidays, an
15 additional nine days would be an appropriate amount of time to allow them to complete their
16 discussions;

17 NOW THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE
18 PARTIES HERETO AND THEIR COUNSEL OF RECORD THAT the deadline for the parties
19 to submit a stipulation concerning the cross-motions to compel, as directed by the Court, shall be
20 continued from December 21, 2010 to December 30, 2010.

21 Date: December 21, 2010

MUNGER, TOLLES & OLSON LLP

22
23 By: /s/ James C. Rutten

James C. Rutten

24 Attorneys for Defendants WELLS FARGO
25 BANK, N.A. (successor by merger to
26 WACHOVIA BANK, N.A.) and
27 METROPOLITAN WEST SECURITIES LLC
28

1 Date: December 21, 2010

BARGER & WOLEN LLP

2
3 By: /s/ Travis R. Wall
Travis R. Wall

4 Attorneys for Plaintiff STATE
5 COMPENSATION INSURANCE FUND

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9 PURSUANT TO STIPULATION, IT IS SO ORDERED:

10 DATED: December 22, 2010

11 Elizabeth D. Laporte
The Honorable Elizabeth D. Laporte
United States District Court Judge